

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KESIA PRICE, Individually and on Behalf
of All Other Persons Similiary Situated,

Plaintiffs,

-against-

PORTER NOVELLI, INC. and OMNICOM
GROUP, INC.,

Defendants.

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: JUN 10 2008

07 Civ. 5869 (PAC)

SUPPLEMENTAL AND
AMENDED CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER

The Civil Case Management Plan and Scheduling Order dated and filed September 18, 2007 is hereby supplemented and amended as follows:

(1.) Paragraph 5 and 13 are hereby amended: All fact discovery shall be completed no later than July 31, 2008.

(2.) The 6/11/2008 PTC is adjourned to Thursday, July 17, 2008 at 2:15 p.m. in Courtroom 20-C

SO ORDERED:

By: Paul A. Crotty

HON. PAUL A. CROTTY
United States District Judge

Dated: New York, New York
June 10, 2008

LOCKS LAW FIRM
PLLC

110 East 55th Street
New York, New York 10022
T 212.838.3333
T 866.LOCKSLAW
F 212.838.3735
lockslaw.com

Andrew P. Bell
abeli@lockslawny.com

June 9, 2008

VIA E-MAIL

Hon. Paul Crotty
United States District Court, Southern District of New York
500 Pearl Street, Room 735
New York, New York 10007

Re: *Price v. Porter Novelli, Inc., et al.*
07 Civ. 5869(PAC)

Dear Judge Crotty:

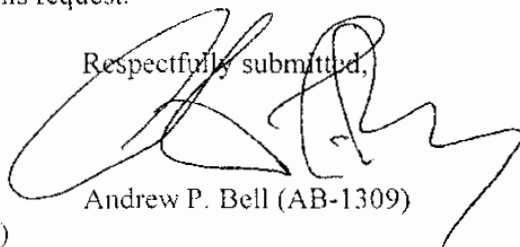
We represent the plaintiff in the above-referenced FLSA putative collective action. This letter is submitted to respectfully request that this Court extend the fact and deposition cut-off dates from June 13, 2008 to July 31, 2008 (see attached proposed order), and to adjourn the Court Conference presently scheduled for Wednesday, June 11, 2008 at 2:45 p.m to a date convenient to the Court during the week of July 14, 2008. Defense counsel consents to these requests.

Discovery has been proceeding in this case. Document discovery appears complete for this phase of discovery. As this Court is aware, our application for reconsideration of this Court's ruling during the deposition of Ms. Reeves is pending. Once the parties have a ruling on that issue, we can schedule another former employee of Defendant Porter Novelli, Inc. Further, both Defendants' 30(b)(6) depositions have been completed. Once Plaintiff reviews that transcript, we anticipate still needing at least two more depositions of Defendant Porter Novelli, Inc.'s current and/or former employees.

The request for an adjournment of the Court Conference is made because of the requested extension of time for the discovery cut-off.

This is the third and last request for an extension of the Case Management dates. Thank you for your consideration of this request.

Respectfully submitted,



Andrew P. Bell (AB-1309)

cc: John D. Shyer, Esq. (via email)
Amy S. Donovan, Esq. (via email)